

Presented to the Court by the foreman of the
Grand Jury in open Court, in the presence
of the Grand Jury and FILED in the U.S.
DISTRICT COURT at Seattle, Washington
August 5, 2020

WILLIAM M. McCOOL, Clerk

By  Deputy

The Honorable John C. Coughenour

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff,

v.

CAMERON BRANDON SHEA,
KALEB J. COLE,
TAYLOR ASHLEY PARKER-DIPEPPE,
JOHNNY ROMAN GARZA,
Defendants.

NO. CR20-032JCC

SUPERSEDING INDICTMENT

The Grand Jury charges that:

COUNT 1

**(Conspiracy to Mail Threatening Communications, to Commit Stalking, and
to Interfere with Federally Protected Activities)**

Beginning at a time unknown, but not later than November 2019, and continuing
until on or about February 26, 2020, at King County, within the Western District of
Washington, and elsewhere, CAMERON BRANDON SHEA, KALEB J. COLE,
TAYLOR ASHLEY PARKER-DIPEPPE, and JOHNNY ROMAN GARZA, along with
others known and unknown, did knowingly and willfully conspire, combine, confederate,
and agree to commit offenses against the United States, to wit: Mailing Threatening

1 Communications, in violation of Title 18, United States Code, Section 876(c); Stalking,
2 in violation of Title 18, United States Code, Section 2261A; and Interfering with
3 Federally Protected Activities, in violation of Title 18, United States Code, Section 245.

4 **A. Object of the Conspiracy**

5 1. The object of the conspiracy was for CAMERON BRANDON SHEA,
6 KALEB J. COLE, TAYLOR ASHLEY PARKER-DIPEPPE, and JOHNNY ROMAN
7 GARZA to threaten journalists and advocates who have worked to expose anti-Semitism,
8 particularly Jews and other minorities, with the intent to cause fear of bodily harm,
9 harass, intimidate, and retaliate against reporting unfavorable to the Atomwaffen
10 Division, a neo-Nazi group.

11 **B. Manner and Means of the Conspiracy**

12 2. It was part of the conspiracy that KALEB J. COLE and CAMERON
13 BRANDON SHEA helped to create threatening posters, which included a poster of a
14 person in a skull mask holding a Molotov cocktail in front of a house, another depicting
15 people in skull masks holding guns with the messages "These People Have Names and
16 Addresses" and "Death to Pigs," and another littered with swastikas with the message,
17 "We Know Where You Live." All three posters contained a place for the recipient's
18 personal information, including their home address, and warned "You Have Been Visited
19 By Your Local Nazis."

20 3. It was part of the conspiracy that CAMERON BRANDON SHEA, KALEB
21 J. COLE, TAYLOR ASHLEY PARKER-DIPEPPE, and JOHNNY ROMAN GARZA
22 conducted research online to identify journalists and advocates to threaten, specifically
23 targeting Jews and other minorities.

24 4. It was part of the conspiracy that CAMERON BRANDON SHEA, KALEB
25 J. COLE, TAYLOR ASHLEY PARKER-DIPEPPE, and JOHNNY ROMAN GARZA
26 compiled the home addresses and other personal information for the above-mentioned
27 journalists and advocates, using online sources.

1 5. It was part of the conspiracy that CAMERON BRANDON SHEA, KALEB
2 J. COLE, TAYLOR ASHLEY PARKER-DIPEPPE, and JOHNNY ROMAN GARZA
3 planned and plotted to threaten the above-mentioned journalists and advocates through
4 online communications among themselves and others.

5 6. It was part of the conspiracy that CAMERON BRANDON SHEA, KALEB
6 J. COLE, TAYLOR ASHLEY PARKER-DIPEPPE, and JOHNNY ROMAN GARZA
7 agreed to mail the threatening posters to the journalists and advocates, and to affix the
8 posters on their residences.

9 7. It was part of the conspiracy that CAMERON BRANDON SHEA, KALEB
10 J. COLE, TAYLOR ASHLEY PARKER-DIPEPPE, and JOHNNY ROMAN GARZA
11 took steps to hide and conceal their actions, including using an encrypted chat service and
12 wearing disguises during the operation.

13 **C. Overt Acts**

14 8. During and in furtherance of the conspiracy, at King County, within the
15 Western District of Washington, and elsewhere, one or more of the conspirators
16 committed one or more of the following overt acts, among others:

17 a. In December 2019, KALEB J. COLE helped create a collection of
18 threatening posters that were designed to threaten bodily harm, intimidate, harass, and
19 retaliate against reporters and advocates, particularly Jews and other minorities.

20 b. On or about January 25, 2020, CAMERON BRANDON SHEA
21 purchased stamps and packaging tape, and mailed threatening posters to a reporter and
22 two individuals associated with the Anti-Defamation League.

23 c. On or about January 25, 2020, TAYLOR ASHLEY PARKER-
24 DIPEPPE affixed a threatening poster on a residence that he believed belonged to a
25 journalist.

26 d. On or about January 25, 2020, JOHNNY ROMAN GARZA and
27 another individual affixed a threatening poster on the home of an editor of a local Jewish
28 publication.

1 All in violation of Title 18, United States Code, Section 371.

2 **COUNT 2**

3 **(Mailing Threatening Communications)**

4 On or about January 25, 2020, at King County, within the Western District of
5 Washington, and elsewhere, CAMERON BRANDON SHEA, KALEB J. COLE,
6 TAYLOR ASHLEY PARKER-DIPEPPE, and JOHNNY ROMAN GARZA knowingly
7 and willfully did deposit in an authorized depository for mail matter, to be sent and
8 delivered by the Postal Service, and knowingly caused to be delivered by the Postal
9 Service according to the directions thereon, a communication, addressed to Victim #1, a
10 news reporter, and containing a threat to injure Victim #1.

11 The Grand Jury further alleges that this offense was committed during and in
12 furtherance of the conspiracy charged in Count 1, above.

13 All in violation of Title 18, United States Code, Section 876(c).

14 **COUNT 3**

15 **(Mailing Threatening Communications)**

16 On or about January 25, 2020, at King County, within the Western District of
17 Washington, and elsewhere, CAMERON BRANDON SHEA, KALEB J. COLE,
18 TAYLOR ASHLEY PARKER-DIPEPPE, and JOHNNY ROMAN GARZA knowingly
19 and willfully did deposit in an authorized depository for mail matter, to be sent and
20 delivered by the Postal Service, and knowingly caused to be delivered by the Postal
21 Service according to the directions thereon, a communication, addressed to Victim #2, a
22 person associated with the Anti-Defamation League, and containing a threat to injure
23 Victim #2.

24 The Grand Jury further alleges that this offense was committed during and in
25 furtherance of the conspiracy charged in Count 1, above.

26 All in violation of Title 18, United States Code, Section 876(c).

COUNT 4
(Mailing Threatening Communications)

On or about January 25, 2020, at King County, within the Western District of Washington, and elsewhere, CAMERON BRANDON SHEA, KALEB J. COLE, TAYLOR ASHLEY PARKER-DIPEPPE, and JOHNNY ROMAN GARZA knowingly and willfully did deposit in an authorized depository for mail matter, to be sent and delivered by the Postal Service, and knowingly caused to be delivered by the Postal Service according to the directions thereon, a communication, addressed to Victim #3, a person associated with the Anti-Defamation League, and containing a threat to injure Victim #3.

The Grand Jury further alleges that this offense was committed during and in furtherance of the conspiracy charged in Count 1, above.

All in violation of Title 18, United States Code, Section 876(c).

COUNT 5
(Interference with Federally Protected Activity)

On or about January 25, 2020, at King County, within the Western District of Washington, and elsewhere, CAMERON BRANDON SHEA, KALEB J. COLE, TAYLOR ASHLEY PARKER-DIPEPPE, and JOHNNY ROMAN GARZA, by threat of force, willfully intimidated and interfered with, and attempted to intimidate and interfere with, Victim #2, a Jewish woman associated with the Anti-Defamation League, because of Victim #2's religion and because she was and had been enjoying employment, and the perquisites thereof, by a private employer.

The Grand Jury further alleges that the offense involved the threatened use of a dangerous weapon, explosives, and fire.

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1 The Grand Jury further alleges that this offense was committed during and in
2 furtherance of the conspiracy charged in Count 1, above.

3 All in violation of Title 18, United States Code, Section 245.
4


5 A TRUE BILL:

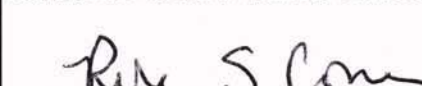
6 DATED: 8/5/2020
7

8 (Signature of Foreperson redacted pursuant to
9 the policy of the Judicial Conference of the
10 United States)

11 FOREPERSON

12 
13 _____
14 BRIAN T. MORAN
15 United States Attorney

16 
17 _____
18 TODD GREENBERG
19 Assistant United States Attorney

20 
21 _____
22 THOMAS M. WOODS
23 Assistant United States Attorney
24
25
26
27
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